

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 PAT CLARK, JR., individually, as Executor of the
7 Estate of Bernice Clark, as Trustee of the Pat Clark,
8 Jr. Separate Property Trust, as Trustee of the Pat Clark
9 GST Trust, as Trustee of the Pat Clark Issue Trust, as
10 Trustee of the Bernice Clark Retained Annuity Trust
11 #2, and as Trustee of the Bernice Clark 2000
12 Retained Annuity Trust; BARBARA C. KLASSEN,
13 individually, as Trustee of the Barbara C. Klassen
14 Legacy Trust, and as Trustee of the Clark Ranch
15 House Trust; JOANN CALLAHAN a/k/a JOANN P.
16 CLARK, individually, as Trustee of the Joann Clark
17 Legacy Trust, and as Trustee of the Clark Ranch
18 House Trust; MARY LOUISE HOUSTON,
19 individually, as Trustee of the Saucer 5 Legacy Trust,
20 and as Trustee of the Clark Ranch House Trust;
21 ALAN GREEN, as Trustee of the Houston
22 Irrevocable Trust; KIMBERLY WASSERBURGER
23 KOUBA; C.R. CLARK; RORY CLARK; and
24 DANIEL T. CALLAHAN,

25 Defendants.

26 AND ALL RELATED CLAIMS.

Case No. 2:14-cv-01372-JAD-PAL

STIPULATION EXTENDING THE
CASE DEADLINES

(First Request)

STIPULATION EXTENDING THE CASE DEADLINES

21 Pursuant to Local Rule 6-1, and the Federal Rules of Civil Procedure, the Parties hereby
22 acknowledge their stipulation and agreement to extend the following deadlines:

- 23 1. As set forth in the Scheduling Order (Doc. 28) entered by the Court the following
24 deadlines are currently in effect:

25 Discovery Cut-Off Date: June 5, 2015

26 Rebuttal Expert Disclosures: May 6, 2015

27 Dispositive Motions: July 6, 2015

9060 WEST CHEYENNE AVENUE
LAS VEGAS, NEVADA 89129
TELEPHONE (702) 853-5483
FACSIMILE (702) 853-5485
WWW.SDFNLAW.COM

SOLOMON
DWIGGINS & FREER
TRUST AND ESTATE ATTORNEYS



1 Pretrial Order: August 5, 2015 (In the event dispositive motions are
2 filed the date for filing the joint pretrial order shall be suspended until thirty (30) days
3 after decision of the dispositive motion or further order of the court.)

4 2. The parties have been actively engaging in discovery in this matter. The parties
5 have exchanged initial disclosures pursuant to Fed.R.Civ.P. 26-1, served interrogatories and
6 requests for production of documents and designated expert witnesses.

7 3. The Parties collectively desire to extend the current deadlines set forth above by
8 approximately 100 days , so that the parties can engage in settlement negotiations and if necessary
9 a court imposed settlement conference before incurring any additional litigation costs.
10 Specifically, the parties hereby respectfully request that the Court amend the Scheduling Order as
11 follows:

12 4. Discovery Cut-Off Date: September 15, 2015

13 5. Rebuttal Expert Disclosures: June 8, 2016

14 6. Dispositive Motions: October 15, 2015

15 7. Pretrial Order: November 16, 2015 (In the event dispositive
16 motions are filed, the date for filing the proposed joint pre-trial order shall be suspended until
17 thirty (30) days after decision of the dispositive motion or further order of the court.)

18 8. The Parties state that this stipulation is made in good faith and not for purposes of
19 delay.

20 RESPECTFULLY SUBMITTED this 1st day of May, 2015.

21 SOLOMON DWIGGINS & FREER, LTD. WINSTEAD PC

22 /s/ Alexander G. LeVeque
23 Mark A. Solomon, Bar No. 418_____
msolomon@sdfnlaw.com
24 Alexander G. LeVeque, Bar No. 11183
aleveque@sdfnlaw.com
25 9060 West Cheyenne Avenue
Las Vegas, Nevada 89129
26 (702) 853-5483__

27 -and-

28 Douglas Edwards, Bar No. 202

/s/ Stephanie Loomis Price
Stephanie Loomis-Price, Pro Hac Vice
Texas State Bar No. 24007565_____
sloomisprice@winstead.com
Trisha J. English, Pro Hac Vice
Texas State Bar No. 24055451
tenglish@winstead.com
600 Travis Street
1100 JPMorgan Chase Tower
Houston, Texas 77002
(702) 650-2750__

doug@nvtaxlaw.com
EDWARDS & CHAMBERS, LLP
10191 Park Run Drive, Suite 110
Las Vegas, Nevada 89145
(702) 242-5282

*Attorneys for Barbara C. Klassen,
individually, as Trustee of the Barbara C.
Klassen Legacy Trust, and as Trustee of the
Clark Ranch House Trust, Joann Callahan
a/k/a Joann P. Clark, individually, as
Trustee of the Joann Clark Legacy Trust, and
as Trustee of the Clark Ranch House Trust,
Kimberly Wasserburger Kouba, C.R. Clark,
Rory Clark, and Daniel T. Callahan*

CAROLINE D. CIRAOLLO
Acting Assistant Attorney General

/s/ Virginia Cronan Lowe
Virginia Cronan Lowe
virginiacronan.lowe@usdoj.gov
Trial Attorney, Tax Division
U.S. Department of Justice
P.O. Box 683
Ben Franklin Station
Washington, DC 20044
(202) 307-6484
Of Counsel:
Daniel Bogden
United States Attorney
District of Nevada

Attorneys for the United States of America

-and-

Layne T. Rushforth, Bar No. 1004
layne@rushforth.net
THE RUSHFORTH FIRM, LTD.
9505 Hillwood Drive, Suite 100
Las Vegas, Nevada 89134
(702) 255-4552

*Attorneys for Pat Clark, Jr., individually, as
Executor of the Estate of Bernice Clark, as
Trustee of the Pat Clark, Jr. Separate Property
Trust, as Trustee of the Pat Clark Voting Stock
Trust, as Trustee of the Pat Clark GST Trust,
as Trustee of the Pat Clark Issue Trust, as
Trustee of the Bernice Clark Retained Annuity
Trust #2, and as Trustee of the Bernice Clark
2000 Retained Annuity Trust*

IT IS SO ORDERED:


U.S. DISTRICT/MAGISTRATE JUDGE

DATED: May 12, 2015

9060 WEST CHEYENNE AVENUE
LAS VEGAS, NEVADA 89129
TELEPHONE (702) 853-5483
FACSIMILE (702) 853-5485
WWW.SDFNLAW.COM

SOLOMON
DWIGGINS & FREER
TRUST AND ESTATE ATTORNEYS